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March 19, 2020

**BY ECF**

Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 701  
New York, NY 10007

Re: *King, et al. v. Wang et al.*, Case No. 1:14-cv-07694-LJL

Dear Judge Liman:

We write on behalf of the Defendants Andrew Wang and Shou-Kung Wang, with the consent of counsel for Plaintiff Yien-Koo King, to request an extension of deadlines to file opposition and reply briefs to the parties' summary judgment motions, which were filed on February 14, 2020. The parties jointly request that the March 23 deadline to file opposition briefs be extended to April 13, and the April 15 date for the parties to file reply briefs be extended to April 27.

In light of disruptions from the developing COVID-19 pandemic, there is good cause to grant the parties' request. My partner, Thomas Kelly, is lead counsel for the Wangs and has taken ill. In addition, our firm is currently closed and operations are transitioning to enable counsel and staff to work remotely.

Various deadlines in this matter were previously extended by the Court that affected deadlines to file dispositive motions. On July 30, 2019, Judge Keenan granted a request by the Defendants to extend the initial August 5, 2019 deadline to file dispositive motions to December 20, 2019 to allow for expert discovery, which had not yet commenced, to be completed. (Dkt. 184.) On September 4, the Court granted a request by Plaintiff, with consent of Defendants, to extend the schedule for the exchange of expert reports and depositions, which resulted in movement of the deadline to file dispositive motions to January 17, 2020. (Dkt. 186.) On January 13, 2020, the Court granted a joint request to extend the deadline to complete expert depositions when Defendants' expert was unavailable due to illness, and extended the deadline to submit dispositive motions to February 14, 2020. (Dkt. 191.) On March 11, 2020, your Honor

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granted a request by Defendants, with consent of Plaintiff, to extend the deadline to submit oppositions to summary judgment motions to March 23, 2020, and extended the deadline to submit reply briefs to April 15, 2020. (Dkt. 206.)

Accordingly, the parties jointly request that the Court issue an order:

- 1) Extending the time to submit oppositions to summary judgment motions to April 13, 2020; and
- 2) Extending the time to submit reply briefs to April 27, 2020.

Counsel are available for a telephonic conference at the Court's convenience should Your Honor wish to discuss.

Respectfully submitted,

/s/ *Kim Conroy*  
Kim Conroy

cc: All counsel of record (by ECF)